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Air Permitting

Who Regulates Air Quality?

- U.S. EPA
- DEQ, Air Quality Division
- Local Government

How is Air Quality Regulated

- Clean Air Act www.epa.gov/air/caa
- Part 55, of the Natural Resource and Environmental Protection Act (NREPA) www.michigan.gov/deq ("Key Environmental Topics" then "Laws and Rules")
- Michigan Air Pollution Control Rules www.michigan.gov/air ("Laws and Rules")
- Requirements from laws and rules are identified in an air permit

Permit to Install (PTI)

- A.K.A New Source Review Permit
- Applicable to any business regardless of size
- Pre-Construction Permit
- Required by R 336.1201 of Michigan Air Pollution Control Rules (Rule 201)

When is a Permit to Install Required?

- Air permit is required if process or activity emits an air contaminant.
- Unless, process or activity is specifically exempted in rules.

Boilers

- Applicable exemption = R 336.1282(b)
- Permit required if:
 - Nat gas max heat input capacity > 50 million Btu/hr
 - Fuel Oil max heat input capacity >20 million Btu/hr

Standby Generators

- Applicable exemption = R 336.1285(g)
- Permit Required if:
 - Generator max heat input > 10 Million Btu/hr
 - Emissions are Significant - CO and NOx emissions > 100 tons/yr and 40 tons/yr, respectively. Based on 500 hours/yr.

Degreasers/Cold Cleaners

- Applicable exemption = R 336.281(h)
- Exempt if air/vapor interface not more than 10 ft2

Bulb Crushers

- No Exemption
- Air Permit Required

Painting Operations

- Applicable exemption = R 336.1287(c)
- Air permit required if use > 200 gal coating/month
- Must keep records

The Air Permit Application

- Free www.deq.state.mi.us/aps/#PTI
- Basic Source Information
- Stack information
- Process and site information
- Emission estimates

The Air Permit

- Contains requirements
- Contract between state of MI and business

Renewable Operating Permit (ROP)

- A.K.A Title V Permit
- Title V of Clean Air Act
- Required if Facility is a “Major Source”

Major Source = Potential to Emit:

- > 100 tons/yr Criteria Air Pollutant (CO,
- > 10 tons/yr single Hazardous Air Pollutant (HAP).
- >25 tons/yr total Hazardous Air Pollutants

Potential to Emit = Maximum amount of air contaminants that your source could emit if:

- Operate at 100% of design capacity;
- Operated 24hrs/day, 365 days/yr
- Worse-case materials used or processed 100% of the time
- No air pollution control equipment

ROP Requirements

- Apply within 12 months of becoming a major source
- Renew Every 5 years
- Annual Air Quality Fee
- Annual Air Emissions Reporting
- Annual and Semi-Annual Compliance Reporting
- Deviation Reporting

10 Tips for Staying in Compliance with Air Quality Regulations

1. Conduct a Facility Inventory
 - Go through facility and make a list of each process that emits air contaminants.
 - Next to each item, write down either the Permit under which the equipment was installed or the rule that exempted that piece of equipment from having to obtain a PTI.
 - Every emission unit should be either permitted or exempt.
 - Keep this survey in your records.
2. Know Your Permit and Understand Requirements
3. Establish Procedures
 - Monitoring procedures
 - Recordkeeping practices
 - Reporting schedules
 - Internal review process
4. Practice Good Record Keeping
5. Know the Reporting Deadlines
6. Don't Recreate Records or Falsify Data

7. Take Immediate Action to Correct Violations (Don't wait until you get caught!)
8. Do not Ignore Correspondence from the DEQ
9. Communicate with your Inspector
 - Ask for a business card when they visit
 - Ask questions
10. Educate Yourself
 - Understand Terminology
 - Read DEQ Education materials
 - Attend DEQ Workshops
 - Keep up on Rules

Resources

- Find Permits www.deq.state.mi.us/aps/
- Online Training www.michigan.gov/deqworkshops (click on "Online Training")
- Publications Center www.deq.state.mi.us/pubcenter/
- Training is offered by our experts on a variety of environmental programs
www.michigan.gov/deqworkshops